

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

FILED
U.S. DISTRICT COURT
DISTRICT OF MASS
CIVIL NO. 04 CV 10835-MEL

DAVID M. GOLDEN, ET ALS
Plaintiffs

VS.

COUNTY OF SUFFOLK,
Defendant
AND CONSOLIDATED CASES

)
)
)
)
) JOINT STATEMENT CONTAINING
) PROPOSED PRETRIAL SCHEDULE
) PURSUANT TO LR, D.MASS. RULE 16.1
)
)
)

I. Discovery Plan

Completion of written discovery - 03/23/06

Completion of depositions - 09/23/06

Expert Witness Disclosure - 06/23/06

II. Motions Schedule

FRCP Rule 12 motions - 09/23/05

FRCP Rule 15, 19, 20 motions - 09/23/05

FRCP Rule 56 motions - 10/23/06

Opposition to Rule 56 Motion due four (4) weeks after service of said motion-Reply brief due two (2) weeks after service of opposition.

III. Certification of Counsel

Plaintiffs' counsel and plaintiffs certify that they have conferred regarding a budget for this litigation, and regarding alternative dispute resolution.

IV. Agenda of Matters to be Discussed at Scheduling Conference


- 1) FRCP Rule 34 Entry to inspect and photograph jail cell
- 2) Deposition of inmate percipient witnesses

V. Trial by Magistrate Judge

Plaintiffs are agreeable to trial by magistrate judge.

Defendant is not agreeable to trial by magistrate judge.

VI. Plaintiffs have served written settlement demands upon defendant, which demands have been rejected at this time.



ATTORNEY FOR PLAINTIFFS
ROBERT H. TOBIN, JR.
TOBIN and TOBIN, P.C.
735 South Street
Roslindale, MA 02131-1705
Tel. (617) 325-1010
B.B.O. No. 499425

Dated

4/6/05

DAVID GOLDEN, PLAINTIFF

JOHN CONNOLLY, PLAINTIFF

THOMAS CROSBY, PLAINTIFF

MICHAEL DWYER, PLAINTIFF

EDWARD ELLIES, PLAINTIFF

ROBERT WISNIEWSKI, PLAINTIFF

E. M. Caulo

ATTORNEY FOR THE DEFENDANT
Ellen M. Caulo, ^{Deputy} General Counsel
Suffolk County Sheriff's Office
200 Nashua Street
Boston, MA 02114

Dated 4/6/05

Gerard Horgan Supt. House of Correction
COUNTY OF SUFFOLK-DEFENDANT

By: *Gerard Horgan, (Exec)*